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Chesnutt/OU=R9/O=USEPA/C=US@EPA[]; N=Gerald Hiatt/OU=R9/O=USEPA/C=US;CN=Stan Smucker/OU=R9/O=USEPA/C=US@EPA;CN=Dustin Minor/OU=R9/O=USEPA/C=US@EPA;CN=Elizabeth Cox/OU=R9/O=USEPA/C=US@EPA;CN=Harold Ball/OU=R9/O=USEPA/C=US@EPA;CN=John Chesnutt/OU=R9/O=USEPA/C=US@EPA[]; N=Stan Smucker/OU=R9/O=USEPA/C=US@EPA;CN=Dustin Minor/OU=R9/O=USEPA/C=US@EPA;CN=Elizabeth Cox/OU=R9/O=USEPA/C=US@EPA;CN=Harold Ball/OU=R9/O=USEPA/C=US@EPA;CN=John Chesnutt/OU=R9/O=USEPA/C=US@EPA[]; N=Dustin Minor/OU=R9/O=USEPA/C=US@EPA;CN=Elizabeth Cox/OU=R9/O=USEPA/C=US@EPA;CN=Harold Ball/OU=R9/O=USEPA/C=US@EPA;CN=John Chesnutt/OU=R9/O=USEPA/C=US@EPA[]; N=Elizabeth Cox/OU=R9/O=USEPA/C=US@EPA;CN=Harold Ball/OU=R9/O=USEPA/C=US@EPA;CN=John Chesnutt/OU=R9/O=USEPA/C=US@EPA[]; N=Harold Ball/OU=R9/O=USEPA/C=US@EPA;CN=John Chesnutt/OU=R9/O=USEPA/C=US@EPA[]; N=John Chesnutt/OU=R9/O=USEPA/C=US@EPA[]

From: CN=Alana Lee/OU=R9/O=USEPA/C=US
Sent: Mon 1/23/2012 8:20:03 PM
Subject: Heads Up: R9 Interim TCE Short Term Action Level Comment for Non-Residential/Commercial Worker to Google and Schlumberger - MEW Superfund Site, Mountain View, CA
MAIL_RECEIVED: Mon 1/23/2012 8:20:02 PM

Hi All,

Jane Diamond wanted us to give you a heads up on the interim TCE short term removal action level comment that R9 provided to the lessee Google, property owner Equity Office Management, and one of the PRPs Schlumberger, on an Air Monitoring and Soil Sampling Plan for Excavation Activities at the MEW Site in Mountain View, CA (see comment below). We understand that there is an ongoing national discussion on the application of the new 2011 TCE non-cancer reference concentration for residential and non-residential/commercial exposure. In this specific case, while the 2010 MEW Site ROD Amendment for Vapor Intrusion established TCE indoor air cleanup levels for long-term residential and non-residential exposure of 1 microgram per cubic meter ($\mu\text{g}/\text{m}^3$) and 5 $\mu\text{g}/\text{m}^3$, respectively, we did not include short-term levels because all of the indoor air data were far below the short-term screening levels (e.g., intermediate ATSDR Minimal Risk Level of 540 $\mu\text{g}/\text{m}^3$) which R9 has been using at our TCE vapor intrusion sites. In light of the new TCE toxicity assessment, however, R9 is grappling with how to apply the new non-cancer value since it has short-term implications at much lower levels than previously assumed.

The new non-cancer value is based in part on developmental effects which are adverse health effects associated with shorter-term exposures of 24 hours or less. To date, R9 has been using as its short-term action level 540 $\mu\text{g}/\text{m}^3$ based on ATSDR's MRL for neurological effects, and we do not know when and if ATSDR will be updating its TCE values incorporating the new toxicity evaluation. Because EPA's new non-cancer value is derived to protect the fetus, R9 staff familiar with the TCE assessment considers it appropriate to view the new non-cancer value as the short-term guideline for TCE exposure. While we plan to incorporate this new TCE information in our decision-making throughout the MEW Site and other TCE Vapor Intrusion sites, there are instances where we will need to establish interim short-term action levels now, and we would like to have a coordinated and well-supported approach.

Specifically, in the Google/Schlumberger situation, where Google is the lessee doing improvements on two existing buildings overlying shallow TCE groundwater contamination, R9 provided comments/recommendations on taking proactive steps (actively ventilating during interior trenching through the slab, etc). In those comments, we provided a proposed TCE interim short-term removal action level of 15 $\mu\text{g}/\text{m}^3$; however, we did not provide all the supporting information in the comment. We expect that Google, the property owner Equity Office Management, and the PRP Schlumberger will be contacting us immediately to discuss EPA's basis for these short-term levels and questioning whether this is consistent with what EPA is doing nationally. This example demonstrates the urgency for a nationally consistent application of the new TCE toxicity information and we would like to ensure that we are approaching this in a coordinated manner. We know this is a complicated issue and are available to discuss the specifics with you.

Thank you for your support.

Alana

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Superfund Division

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Excerpt from January 20, 2012 EPA R9 Comment Letter on Air Monitoring and Soil Sampling Plan for Google-Fairchild Plumbing Excavation Activities, 313 and 323 Fairchild Drive, Mountain View, CA,  
As you may know, in September 2011 EPA finalized the Toxicological Review for Trichloroethylene (TCE) which includes new TCE inhalation toxicity values [see <http://www.epa.gov/iris/subst/0199.htm>]. EPA Region 9 is currently evaluating and considering a TCE interim short term removal action level of 15 micrograms per cubic meter (ug/m<sup>3</sup>) at the MEW Site for the non-residential/commercial worker scenario. EPA's consideration of this TCE short-term removal action level is based on the new inhalation toxicity values, supporting information in the TCE Toxicity Assessment, and potential short-term exposure (10-hour worker exposure per day).

In light of this information and as a matter of good construction practice, EPA recommends that you take this interim removal action level into account and that the buildings be maximally ventilated while workers are inside the building and subsurface conduits remain open to ensure that workers are protected from Site contaminants. EPA also recommends that the Sampling Plan include monitoring for TCE in air and contingency measures if the interim removal action level is exceeded while subsurface conduits remain open and there is potential exposure to workers.